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3 3. Prior to any disclosure of Protected Documents as described in this  
4 Order, Plaintiff shall obtain from each proposed recipient of the Protected  
5 Documents their signature on a copy of the Protective Order that states that the  
6 recipient has received a copy of the Protective Order regarding the Protected  
7 Documents and agrees to be bound by such order. By signing a copy of the  
8 Protective Order the recipient agrees that he or she has read the order, represents  
9 that he or she is a person permitted to have access to information from the  
10 Protected Documents and agrees that he or she will make no further disclosure of  
11 the information received, will personally protect the confidentiality of all copies  
12 and will either return them to Defendants' attorneys at the conclusion of this case,  
13 or will at that time personally destroy them and upon request from Defendants will  
14 provide a sworn affidavit that he or she has done so.  
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19 4. Subject to the terms of this Order, Plaintiff may allow inspection of  
20 Protected Documents or discuss the contents of Protected Documents or  
21 information therefrom only with the following categories of persons and no other:  
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24 a. Duly licensed and professional experts, consultants or  
25 investigators retained by Plaintiff to assist in evaluation, preparation or testimony  
26 in this case;  
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28 b. Any court personnel, court reporter, mediator, judge and or jury  
29 in this case;  
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3 c. Any person identified as having authored or previously received  
4 the material.

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6 5. If it becomes necessary for either party to submit a Protected  
7 Document to the court, that party shall inform the other with sufficient time prior to  
8 the filing of the Protected Document such that a motion to seal the Protected  
9 Document can be noted prior to filing. A motion to seal will not be granted unless  
10 the motion and supporting documents establish compelling reasons to seal.  
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13 6. Plaintiff shall use the Protected Documents or information obtained  
14 from them only for the purpose of prosecuting this litigation.

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16 7. At the time of exchange of exhibit lists, the Plaintiff shall list in the  
17 exhibit list for his case in chief any Protected Document he intends to use at the  
18 time of trial by designating the exhibit as a "PROTECTED DOCUMENT" in  
19 capital letters. The Defendants may request an in camera review of the exhibit and  
20 make the appropriate motion for the handling of the document at trial in  
21 accordance with the Jury Trial Scheduling Order.  
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24 8. Nothing in this Protective Order shall limit any producing party's use  
25 of its own documents nor prevent any producing party from disclosing its  
26 confidential information to any person.  
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29 9. The Court retains jurisdiction to make any amendments, modifications  
30 or additions to the Protective Order as it deems appropriate.

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3 10. The parties, by stipulation, may add additional documents to be  
4 covered by this Order.  
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6 Dated this 13th day of January, 2015.

7 *s/ James P. Hutton*

8 JAMES P. HUTTON

9 United States Magistrate Judge  
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